UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

KJR GROUP, LLC d/b/a FLOOR PLAN) Civil Action No.: 2:23-cv-01175-BHH
VISUALS; FPV GROUP, LLC d/b/a FLOOR PLAN VISUALS; KOCHAI) [formerly Case No. 2023-CP-10-00848,
SHPOON BECERRA,	Ninth Judicial Circuit Court of Common Pleas for Charleston County, South
Plaintiffs,) Carolina]
V.	AFFIDAVIT OF EDWARD FENNO IN SUPPORT OF
ARC GROUP, LLC D/B/A	NOTICE OF REMOVAL
ARCDIMENSION; ABDULLAH ARDA BASCINAR,))
Defendants.)
	_ /

Personally appeared before me, Edward Fenno, who being duly sworn deposes and says as follows:

- I am the attorney for Defendants ARC Group, LLC d/b/a Arcdimension and Abdullah Arda Bascinar ("Defendants") in the present matter.
- I have personal knowledge of the matters contained in this Affidavit unless alleged on information and belief.
- 3. The present lawsuit was initially filed on February 17, 2023, in State of South Carolina, Ninth Judicial Circuit, Court of Common Pleas for the County of Charleston as case no. 2023-CP-10-00848 (the "State Court Action").
- 4. The Defendants were served with the Summons and Complaint in the State Court Action on March 4, 2023. On information and belief, the first day that either of the Defendants first received a copy of the Summons and Complaint, whether by service or otherwise, was February 28, 2023, which is less than thirty (30) days before today's date.

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5. Defendants have not filed a responsive pleading in the State Court Action.

6. All pleadings and other filings in the State Court Action are attached as exhibits to

the Notice of Removal filed concurrently with this Affidavit.

7. The Complaint purports to assert a cause of action for false advertising in violation

of Section 43(a) of the federal Lanham Act, 15 U.S.C. §1125(a). (Complaint ¶¶ 68-76)

8. On information and belief, the other causes of action in the Complaint are so related

to the Lanham Act claim and/or arise from the same or similar facts and circumstances as the

Lanham Act claim that they form part of the same case or controversy as the federal Lanham Act

claim.

FURTHER AFFIANT SAYETH NAUGHT.

Edward Fenno

Sworn to and subscribed before me

this 24th day of March, 2023

Notary Public for South Carolina

My Commission expires: 07. 09 2030